

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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In the Matter of )  
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Regulation of Prepaid Calling Card Services; )  
Arizona Dialtone Inc. Petition for )  
Reconsideration )  
\_\_\_\_\_ )

WC Docket No. 05-68

**COMMENTS OF LIBERTY BELL TELEPHONE, LLC IN SUPPORT OF  
ARIZONA DIALTONE INC. PETITION FOR RECONSIDERATION**

Liberty Bell Telephone, LLC ("Liberty Bell") hereby files these comments in support of the Petition for Reconsideration filed by Arizona Dialtone Inc. in the above-captioned proceeding.<sup>1</sup> Liberty Bell is a small CLEC operating in Colorado.

The FCC should grant Arizona Dialtone's petition in its entirety. We have experienced exactly the same problem: prepaid calling card providers often offer their services through "local" DID numbers, which makes it impossible for originating LECs or CLECs like Liberty Bell to identify the calls being placed through these numbers as long-distance calls subject to access charges. Although the FCC's June 30 Order clearly classified prepaid card providers as telecommunications carriers subject to access charges, it will be impossible for originating LECs and CLECs to assess and collect these access charges unless the FCC grants Arizona Dialtone's petition. Prepaid calling service providers should not be able to continue to avoid paying access charges because of this loophole.

<sup>1</sup> See *Public Notice*, DA 06-1948, rcl. Sept. 28, 2006.

Respectfully submitted

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